

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Newport News Division**

**DAVID D. DENTON,**

**Plaintiff,**

**v.**

**Civ. No. 4:16CV32**

**PENNYMAC LOAN SERVICING, LLC**

**PLAINTIFF'S MOTION FOR AWARD OF ATTORNEYS' FEES**

Plaintiff, David D. Denton, moves the court for an award of costs and attorneys' fees in the amount of \$85,644.39, pursuant to the Defendant's Rule 68 Offer of Judgment and the Fair Credit Reporting Act, 15 U.S.C. §§ 1681o(a)(2) & 1681n(a)(3).

Respectfully submitted,

\_\_\_\_\_  
/s/

Susan M. Rotkis, VSB 40693  
CONSUMER LITIGATION ASSOCS., P.C.  
763 J. Clyde Morris Boulevard, Suite 1-A  
Newport News, Virginia 23601  
(757) 930-3660 – Telephone  
(757) 930-3662 – Facsimile  
E-mail: srotkis@clalegal.com  
*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14 day of December 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

Justin Michael Sizemore  
Reed Smith, LLP

901 E. Byrd Street  
Suite 1700  
Richmond, VA 23219-4069  
Email: [jsizemore@reedsmith.com](mailto:jsizemore@reedsmith.com)

/s/  
Susan M. Rotkis, VSB 40693  
CONSUMER LITIGATION ASSOCS., P.C.  
763 J. Clyde Morris Boulevard, Suite 1-A  
Newport News, Virginia 23601  
(757) 930-3660 – Telephone  
(757) 930-3662 – Facsimile  
E-mail: [srotkis@clalegal.com](mailto:srotkis@clalegal.com)  
*Counsel for Plaintiff*